

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARLIN M. ADAMS, <i>Chapter 11 Trustee of</i>)	
<i>the Post-Confirmation Bankruptcy Estates of</i>)	
<i>CORAM HEALTHCARE CORP. and CORAM,</i>)	
<i>INC.,</i>)	
)	Civ. Action No. 04-cv-1565(SLR)
Plaintiff,)	
v.)	
)	
DANIEL D. CROWLEY, <i>et al.,</i>)	
)	
Defendants.)	
)	

**MOTION FOR SUMMARY JUDGMENT
ON LIABILITY OR, IN THE
ALTERNATIVE, FOR THE
COURT TO DEEM
CERTAIN FACTS ESTABLISHED**

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiff, Arlin M. Adams, Chapter 11 Trustee of the Post-Confirmation Bankruptcy Estates of Coram Healthcare Corporation and Coram, Inc., by his undersigned attorneys and for the reasons set forth in the brief that accompanies this motion, hereby moves for summary judgment on liability. In the alternative, Plaintiff seeks an order under Federal Rule of Civil Procedure 56(d) specifying that certain facts (as set forth fully in Plaintiff's brief) appear without substantial controversy and shall be deemed established upon the trial of this action.

Dated: April 17, 2007

/s/ Michael J. Barrie
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